

UNITED STATES DEPARTMENT OF JUSTICE  
WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents  
Registration Act of 1938, as Amended

For Six Month Period Ending 04 JUN 1982  
(Insert date)

U.S. DEPARTMENT OF JUSTICE  
REGISTRATION UNIT  
JUL 19 4 13 PM '82

Name of Registrant

ARNOLD & PORTER

Registration No.

1750

Business Address of Registrant

1200 New Hampshire Avenue, N. W.  
Washington, D. C. 20036

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual: N.A.

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

N.A.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection  
Ended

N.A.

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☒ Yes No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
------	----------------------	-------------	----------	-----------------

See Attachment No. 1.

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☒ No ☐

If yes, identify each such person and describe his services.

Scott H. Lang, Lawrence A. Schneider, and Norman M. Sinel, who have previously filed Short-Form Registration Statements, have rendered services to foreign principals. Melvin C. Garbow and Thomas J. McGrew, who became partners during earlier periods, began to render services to foreign principals during this period.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or connection	Date terminated
Cary M. Adams	Associate	12/31/81
Howard B. Adler	Associate	2/12/82
Pamela K. Green	Associate	2/16/82
Robert E. Litan	Associate	3/1/82
Richard Orr	Associate	3/26/82
Thomas Spring	Associate	5/31/82

The following person ceased rendering services to foreign principals during this period:

Charles H. Cochran	Associate	12/5/81
--------------------	-----------	---------

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Position or connection	Date connection began
------	----------------------	---------------------------	--------------------------

See Attachment No. 2

## II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

*Name of foreign principal*

*Date of Termination*

Dr. Dirk Alan Maxen-McIntyre

<sup>\*/</sup>  
6/4/82

- 
9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

See Attachment No. 3

- 
10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

See Attachment No. 4

---

## III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment No. 5

---

<sup>1</sup>The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>\*/</sup> After June 4, 1982, although the Registrant's connection with this foreign principal has not been terminated, such connection is limited to activities exempt from registration under Section 3 of the Act.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment No. 6

- 
13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

N.A.

---

<sup>2</sup> The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
-------------	------------------	----------------	---------------

See Attachment No. 7

---

Total

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
--------------------------------------	--------------------------	--	----------------

N.A.

---

<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

<sup>4</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
------	---------	---------	--------

See Attachment No. 8

---

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Date disposed	Name of person to whom given	On behalf of what foreign principal	Description of thing of value	Purpose
---------------	------------------------------	-------------------------------------	-------------------------------	---------

N.A.

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒ \*/

If yes, furnish the following information:

Date	Amount or thing of value	Name of political organization	Name of candidate
------	--------------------------	--------------------------------	-------------------

\*/ See Attachment No. 9

**V - POLITICAL PROPAGANDA**

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal. International Telecommunications Satellite Organization; The London Commodity Exchange Company Limited; The Metal Market and Exchange Company, Ltd.; The London International Financial Futures Exchange Limited; The London Gold Futures Market, Ltd.; British American Arts Association (U.K.), Ltd.

<sup>5</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?  
Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

N.A.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:  
☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☒ Letters or telegrams articles  
☐ Advertising campaigns ☐ Press releases ☒ Pamphlets or other publications ☐ Lectures or speeches  
☒ Other (specify) testimony; position paper
20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:  
☒ Public Officials ☐ Newspapers ☐ Libraries  
☒ Legislators ☐ Editors ☒ Educational institutions  
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups  
☒ Other (Specify) attorneys; foreign government official; brokerage houses; foreign embassies; private company; individuals.
21. What language was used in this political propaganda:  
☒ English ☐ Other (specify) \_\_\_\_\_
22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?  
Yes ☒ No ☐
23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐
24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?  
Yes ☒ No ☐

#### VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A<sup>6</sup> Yes ☒ No ☐

Exhibit B<sup>7</sup> Yes ☒ No ☐

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

<sup>6</sup> The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup> The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.



26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐ No ☐ N.A.

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

W. D. Rogers  
WILLIAM D. ROGERS

Brooksley Landau  
BROOKSLEY LANDAU

Subscribed and sworn to before me at

Washington, DC.

this

16

day of

July

, 19

82

Patricia H. Davis

(Signature of notary or other officer)  
My Commission Expires October 31, 1994

<sup>8</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

ATTACHMENT NO. 1

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

X Yes             No

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Citizen- ship</u>	<u>Position</u>	<u>Date Assumed</u>
Norman M. Sinel	3710 Harrison St., N.W. Washington, D.C. 20015	U.S. Citizen	Partner	1/1/82
Scott B. Schreiber	914 Twin Oaks Drive Potomac, MD 20854	U.S. Citizen	Partner	1/1/82
Lawrence A. Schneider	5914 Woodacres Drive Bethesda, MD 20816	U.S. Citizen	Partner	1/1/82
Scott H. Lang	53 Observatory Circle, Northwest Washington, D.C. 20008	U.S. Citizen	Partner	1/1/82

U.S. DEPARTMENT OF JUSTICE  
OFFICE OF THE ATTORNEY GENERAL  
JUL 19 4 13 PM '82  
INFORMATION  
REGISTRATION UNIT

ATTACHMENT NO. 2

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?

Yes   X   No       

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Position Or Connection</u>	<u>Date Connection Began</u>
Thomas R. Dwyer	2430-C S. Walter Reed Arlington, VA 22206	Associate	1/5/82
Avi Goldsobel	2939 Van Ness St., NW Suite 619 Washington, D.C. 20008	Foreign Associate	4/19/82

In addition, the following persons, hired previously, began to render services relating to foreign principals during this period:

Mary Ann Bradshaw	2501 Calvert St., NW #501 Washington, D.C. 20008	Associate	9/8/81
David A. Katz	2800 Quebec St., NW Washington, D.C. 20008	Associate	11/23/81
K. Peter Schmidt	7606 New Market Dr. Bethesda, MD 20034	Associate	8/4/75
Clifford D. Stromberg	6714 Georgia St. Chevy Chase, MD 20015	Associate	2/18/80

ATTACHMENT NO. 3

9. Have you acquired any new foreign principal during this 6 month reporting period? Yes X No

If yes, furnish following information:

<u>Name and address of foreign principal</u>	<u>Date acquired</u>
The London International Financial Futures Exchange Limited 66 Cannon Street London EC 4N 6AE England	March 1982
The London Gold Futures Market, Ltd. Plantation House Fenchurch Street London EC3M 3AP England	March 1982
The Metal Market and Exchange Company, Ltd. Plantation House Fenchurch Street London EC3M 3AP England	March 1982
VIASA VIASA Towers, Sur 25 Morelos Plaza, Los Caobos Caracas, Venezuela	June 1982

ATTACHMENT NO. 4

10. In addition to those named in Items 8 and 9, if any, list the foreign principals whom you continued to represent during the 6 month reporting period.

Ambassador of the Swiss Confederation  
Federation Suisse des Associations de  
Fabricants d'Horlogerie  
Embassy of the Government of Israel  
International Commodities Clearing House, Ltd.  
The London Commodity Exchange Company, Ltd.  
Union Nacional de Productores de Hortalizas  
British American Arts Association (U.K.) Ltd.  
Corporation for Economic Development H.I. Ltd.  
Dutch Employers Federation  
Table Grape Growers Association  
Government of Spain  
INTELSAT  
Government of Brazil  
The deHavilland Aircraft of Canada, Ltd.

ATTACHMENT NO. 5

11. During this six-month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement?

Yes X

No     

If yes, identify each such foreign principal and describe in full detail your activities and services:

British American Arts Association (U.K.) Ltd.

One of the Registrant's employees served as a member of the Board of Directors and Executive Committee of the principal, provided general information in response to inquiries on the services and activities of the principal, advised the principal about arts exchange programs and related developments in the United States, assisted the principal with respect to a bank account, and co-edited a publication. The Registrant also rendered advice on U.S. laws, regulations and policies concerning taxation.

International Telecommunications Satellite Organization (INTELSAT)

The Registrant rendered advice on U.S. laws, regulations and policies concerning taxation. The Registrant also assisted the foreign principal in its effort to amend Public Law 90-553 (the International Center Act of 1968) to permit the State Department to lease a part of the International Center to the foreign principal for use as its headquarters site.

Table Grape Growers Association

The Registrant rendered assistance in opposing S. 505 and H.R. 1852, concerning agriculture marketing orders affecting table grape imports.

Federation Suisse des Associations de Fabricants d'Horlogerie

The Registrant rendered advice on U.S. laws, regulations and policies concerning trade, watch tariffs, customs requirements, watch imports and exports, antitrust and taxation. The Registrant also assisted the foreign principal in connection with potential legislation affecting duty free treatment of watches imported from U.S. insular possessions.

[Attachment No. 5 is continued on following page.]

ATTACHMENT NO. 5 [continued]

Ambassador of the Swiss Confederation

The Registrant rendered advice on U.S. laws, regulations and policies concerning pending litigation in U.S. courts and agencies, taxation, antitrust, international trade, export policy, economic policy, margin requirements, trademarks and the airline industry.

International Commodities Clearing House, Ltd.,  
The London Commodity Exchange Company, Ltd., and  
The London International Financial Futures Exchange  
Limited

The Registrant rendered advice on reporting requirements of the Commodity Futures Trading Corporation and on U.S. laws, regulations and policies relating to options trading, commodities trading and taxes. The Registrant also assisted the foreign principals in their efforts to amend H.R. 5447 (the Futures Trading Act of 1982).

The Metal Market and Exchange Company, Ltd.  
and The London Gold Futures Market, Ltd.

The Registrant assisted the foreign principals in their efforts to amend H.R. 5447 (the Futures Trading Act of 1982).

Union Nacional de Productores de Hortalizas

The Registrant represented the West Mexico Vegetable Distributors Association in Southwest Florida Winter Vegetable Growers Ass'n v. United States, No. 80-4-00577 (U.S. Court of International Trade). The Registrant also rendered advice on U.S. laws, regulations and policies concerning pesticides.

Government of Brazil

The Registrant rendered advice on U.S. laws, regulations and policies concerning the U.S. foreign tax credit system.

Dutch Employers Federation

The Registrant filed an amicus brief on behalf of the foreign principal in Chicago Bridge & Iron Co. v. Caterpillar Tractor Co., No. 81-349 (U.S. Supreme Court).

[Attachment No. 5 is continued on following page.]

ATTACHMENT NO. 5 [continued]

Embassy of the Government of Israel

The Registrant rendered advice on U.S. laws, regulations, and policies concerning taxation, trade, tariffs, trusts, financing, and aviation. The Registrant also provided legal representation of the principal in connection with a financing transaction.

Dr. Dirk Alan Maxen-McIntire

The Registrant rendered advice on U.S. laws, regulations, legislation and policies concerning taxation.

VIASA

The Registrant rendered assistance in connection with negotiations on U.S. aviation policy.

Corporation for Economic Development H.I. Ltd.

The Registrant assisted the foreign principal in filing a franchise tax return and in administering bank accounts.



ATTACHMENT NO. 6

12. During this six-month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

Yes X

No     

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

International Telecommunications Satellite  
Organization (INTELSAT)

On behalf of the foreign principal, the Registrant had discussions concerning amendments to Public Law 90-553 (the International Center Act of 1968) with Margaret Hayes and Scott Cohen, staff members of the Senate Foreign Relations Committee, and with G. Cranwell Montgomery, Special Counsel to Senator Howard Baker.

Federation Suisse des Associations de Fabricants  
d'Horlogerie

On behalf of the foreign principal, the Registrant had discussions concerning potential legislation affecting duty free treatment of watches imported from U.S. insular possessions with Gary N. Horlich, Deputy Assistant Secretary, Import Administration, U.S. Department of Commerce, Frank Creel, Statutory Import Programs Staff, Import Administration, U.S. Department of Commerce, Richard Seppa, Special Assistant to Deputy Assistant Secretary Horlich, and with David Rohr, Staff Director, Subcommittee on Trade, House Committee on Ways and Means.

International Commodities Clearing House, Ltd.,  
The London Commodity Exchange Company, Ltd., The  
Metal Market and Exchange Company, Ltd., The  
London International Financial Futures Exchange  
Limited, and the London Gold Futures Market, Ltd.

On behalf of these foreign principals, the Registrant had discussions and written communications concerning efforts to amend H.R. 5447 (the Futures Trading Act of 1982) with Dennis Dutterer, General Counsel, Commodity Futures Trading Commission ("CFTC"), Charles Mills, Attorney, Office of

[Attachment No. 6 is continued on following page.]

ATTACHMENT NO. 6 (continued)

General Counsel, CFTC, Philip F. Johnson, Chairman and Commissioner, CFTC, David G. Gartner, Commissioner, CFTC, James M. Stone, Commissioner, CFTC, Susan M. Philips, Commissioner, CFTC, Kalo Hineman, Commissioner, CFTC, Marshall E. Hanbury, Director, Office of Government Affairs, CFTC, Michael Andrews, Executive Assistant to Chairman Johnson, CFTC, Patrick G. Nicolette, Deputy General Counsel, CFTC, Edward F. Greene, General Counsel, Securities and Exchange Commission, Robert Cashdollar, Consultant, House Agriculture Committee, Terrance J. Wear, Assistant Counsel, Senate Agriculture Committee, Daniel J. Goeltzer, Executive Assistant to the Chairman, Securities and Exchange Commission, Anne Chafer, Office of General Counsel (Market and Corporate Regulation), Securities and Exchange Commission, Robert Bor, Chief Counsel, House Agriculture Committee, Marti Cochran, Counsel, Subcommittee on Telecommunications, Consumer Protection, and Finance, House Energy and Commerce Committee, Charles Connors, Staff Assistant to Senator Richard Lugar, Kellee A. Eversole, Staff Assistant to Senator David Boren, John E. Hogan, Minority Counsel, House Agriculture Committee, Thomas Karol and Barbara Cart, Staff Counsel, Permanent Subcommittee on Investigations, Senate Governmental Affairs Committee, Carl P. Rose, Minority Counsel, Senate Agriculture Committee, and Paula Tousini, Legislative Assistant to Senator Lugar.

Embassy of the Government of Israel

On behalf of the foreign principal, the Registrant had discussions concerning U.S.-Israeli trade relations with Donald deKieffer, General Counsel, Office of the United States Trade Representative, Eric Garfinkel, Attorney Advisor, Office of the United States Trade Representative, and Melissa Coyle, Director, Middle Eastern Affairs, Bilateral Affairs Section, Office of the U.S. Trade Representative. On behalf of the foreign principal, the Registrant also had written communications concerning U.S.-Israeli trade relations with Malcolm Churchill, Foreign Service Officer, Economic Bureau, U.S. Department of State. On behalf of the foreign principal, the Registrant had discussions concerning U.S.-Israeli aviation treaties with Daniel M. Kasper, Director, Bureau of International Aviation, Civil Aeronautics Board, and with Mary Pet, Transportation Industry Analyst, Bureau of International Aviation, Civil Aeronautics Board.

VIASA

On behalf of the foreign principal, the Registrant had discussions concerning U.S. aviation policy with Ernest B. Johnston, Jr., Deputy Assistant Secretary for Economic and Business Affairs, U.S. Department of State, James Ferrer, Jr., Director, Office of Aviation, U.S. Department of State, Judith T.

ATTACHMENT NO. 6 (continued)

Connor, Assistant Secretary for Policy and International Affairs, U. S. Department of Transportation, Roz Ellingsworth, Office of the Secretary, Department of Transportation, and Jeffrey N. Shane, Assistant General Counsel for International Law, Department of Transportation.

Table Grape Growers Association

On behalf of the foreign principal, the Registrant had discussions concerning legislation affecting agricultural marketing orders for table grape imports with Jason Peltier, Legislative Assistant for Agriculture to Senator S.I. Hayakawa, and with Denise Alexander, Chief Clerk, Senate Agriculture Committee.

ATTACHMENT NO. 7

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

  X   Yes                             No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Ambassador of the Swiss Confederation</u>			
1/25/82	Swiss Embassy	Legal Fees	\$ 8,750.00
1/25/82	Swiss Embassy	Disbursements	483.72
2/26/82	Swiss Embassy	Legal Fees	6,250.00
2/26/82	Swiss Embassy	Disbursements	255.75
<u>Federation Suisse des Associations de Fabricants d'Horlogerie</u>			
3/09/82	Swiss Watch Federation	Legal Fees	12,500.00
3/09/82	Swiss Watch Federation	Disbursements	216.62
<u>Embassy of the Government of Israel</u>			
1/06/82	Israel Aircraft Industries	Legal Fees	47,274.69
1/06/82	Israel Aircraft Industries	Legal Fees	12,617.50
1/06/82	Israel Aircraft Industries	Disbursements	9,986.82
4/30/82	Israel Aircraft Industries	Disbursements	38,238.00
5/24/82	Treasury of State of Israel	Legal Fees	20,550.00
<u>Union Nacional de Productores de Hortalizas</u>			
2/26/82	Union Nacional de Productores	Legal Fees	5,423.94
2/26/82	Union Nacional de Productores	Disbursements	5,423.95
2/26/82	Union Nacional de Productores	Legal Fees	6,000.00
3/05/82	Union Nacional de Productores	Disbursements	12,888.46
3/10/82	West Mexico Vegetable Distributors	Legal Fees	3,700.00
3/10/82	West Mexico Vegetable Distributors	Disbursements	810.84
3/23/84	Union Nacional de Productores	Disbursements	12,459.12

[Attachment No. 7 is continued on following page.]

ATTACHMENT NO. 7 [continued]

Union Nacional de Productores de Hortalizas [cont'd]

5/24/82	West Mexico Vegetable Distributors	Legal Fees	\$ 4,250.00
5/24/82	West Mexico Vegetable Distributors	Disbursements	225.46

London Commodity Exchange Co., Ltd. and  
International Commodities Clearing House, Ltd.

4/12/82	London Commodity Exchange	Legal Fees	336.30
4/12/82	London Commodity Exchange	Disbursements	187.14

INTELSAT

4/20/82	INTELSAT	Legal Fees	4,500.00
4/20/82	INTELSAT	Disbursements	61.58
5/14/82	INTELSAT	Disbursements	10.70

British American Arts Association (U.K.)

12/17/81	British American Arts Association	Disbursements	300.00
01/29/82	British American Arts Association	Disbursements	347.79

Corporation for Economic Development H.I. Ltd.

12/23/81	Corporation for Economic Development	Legal Fees	10,311.50
05/28/82	Corporation for Economic Development	Legal Fees	2,112.75
05/28/82	Corporation for Economic Development	Disbursements	678.60

Table Grape Growers Association

12/30/81	Table Grape Growers Association	Disbursements	349.12
05/20/82	Table Grape Growers Association	Legal Fees	1,220.00
05/20/82	Table Grape Growers Association	Legal Fees	4,980.00

Government of Brazil

03/16/82	Government of Brazil	Legal Fees	5,848.50
03/16/82	Government of Brazil	Disbursements	260.06

TOTAL -- \$239,808.91

ATTACHMENT NO. 8

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you  
(1) disbursed or expended monies in connection  
with activity on behalf of any foreign  
principal named in Items 8, 9 and 10 of this  
statement? Yes X No       

(2) transmitted monies to any such foreign  
principal? Yes        No X

If yes, set forth below in the required detail  
and separately for each foreign principal an  
account of such monies, including monies  
transmitted, if any, to each foreign principal.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Ambassador of the Swiss Confederation</u>			
Various	Xerox Corporation	Duplicating	\$ 315.80
Various	C&P Telephone	Telephone	61.11
Various	U.S. Postal Service	Postage	6.06
Various	RCA Global Communications	Telexes	17.46
Various	A&P Employees	Local Transportation	322.45
Various	A&P Employees	Cash Expense	105.11
		Total	\$ 827.99

Federation Suisse des Association de Fabricants d'Horlogerie

Various	Xerox Corporation	Duplicating	\$ 349.35
Various	C&P Telephone	Telephone	31.03
Various	U.S. Postal Service	Postage	129.05
Various	RCA Global Communications	Telexes	265.78
Various	A&P Employees	Local Transportation	125.80
Various	A&P Employees	Cash Expense	189.65
Various	Federal Express	Courier Service	17.90
Various	S. Hoglund	Proofreading	3.38
3/22/82	Western Union	Telegram	132.80
		Total	\$ 1,244.74

Embassy of the Government of Israel

Various	Xerox Corporation	Duplicating	\$ 635.08
Various	C&P Telephone	Telephone	129.32
Various	RCA Global Communications	Telexes	176.39
Various	A&P Employees	Local Transportation	350.15
Various	U.S. Postal Service	Postage	.57
Various	A&P Employees	Cash Expense	341.60
Various	A&P Employees	Travel Expense	1,198.18

[Attachment No. 8 is continued on following page.]

ATTACHMENT NO. 8 [continued]

Embassy of the Government of Israel [cont'd.]

Various	Federal Express	Courier Service	\$	20.00
3/29/82	P. Berger	Travel Expense		40.00
4/6/82	R. Jones	Travel Expense		97.31
4/19/82	R. Jones	Travel Expense		117.50
5/28/82	R. Jones	Travel Expense		530.50
4/27/82	R. Jones	Travel Expense		43.50
5/14/82	P. Berger	Travel Expense		120.00
5/24/82	M. Curzan	Travel Expense		178.50
5/21/82	M. Garbow	Travel Expense		142.50
5/21/82	S. Lang	Travel Expense		150.50
4/28/82	P. Berger	Travel Expense		234.00
3/30/82	J. Bryant	Outside Secretarial		15.00
2/17/82	S. Hoglund	Proofreading		2.25
Various	J. H. Jackson	Professional Services		276.80
4/28/82	Pandick Press	Printing		36,085.00
1/15/82	Vory's, Slater, Seymour and Pease	Professional Services		32.58
		Total	\$	40,917.23

Union Nacional de Productores de Hortalizas

1/23/82	FOI Services, Inc.	Professional Services		82.32
		Total	\$	82.32

West Mexico Vegetable Distributors Association

Various	Xerox Corporation	Duplicating	\$	842.85
Various	C&P Telephone	Telephone		27.88
Various	A&P Employees	Local Transportation		103.45
Various	A&P Employees	Cash Expense		208.04
Various	S. Hoglund	Proofreading		2.25
3/25/82	Capital Consultant Svc.	Professional Services		36.80
1/13/82	The Produce News	Publication		20.00
Various	Florida Clipping Service	Professional Services		267.30
		Total	\$	1,508.57

British American Arts Association (U.K.) Ltd.

Various	C&P Telephone	Telephone	\$	18.85
Various	A&P Employees	Local Transportation		3.90
		Total	\$	22.75

Corporation for Economic Development H.I. Ltd.

Various	Xerox Corporation	Duplicating	\$	25.35
Various	U.S. Postal Service	Postage		12.70
Various	C&P Telephone	Telephone		110.06
Various	A&P Employees	Local Transportation		3.00
Various	A&P Employees	Cash Expense		10.00

[Attachment No. 8 is continued on following page.]

ATTACHMENT NO. 8 [continued]

Corporation for Economic Development H.I. Ltd. [cont'd.]

3/15/82	U.S. Corporation Co.	Professional Services	90.00
2/26/82	Secretary of State	Delaware Taxes	69.80
		Total	\$ 320.91

Dutch Employers Federation

Various	Xerox Corporation	Duplicating	\$ 896.00
Various	U.S. Postal Service	Postage	10.40
Various	C&P Telephone	Telephone	24.71
Various	A&P Employees	Local Transportation	65.70
Various	A&P Employees	Cash Expense	91.86
12/18/81	Tax Notes	Publication	51.27
Various	Federal Express	Courier Service	87.00
Various	RCA Global Communications	Telexes	83.42
12/11/81	S. Hoglund	Proofreading	4.50
		Total	\$1,314.86

Table Grape Growers Association

Various	Xerox Corporation	Duplicating	\$ 14.25
Various	A&P Employees	Local Transportation	19.61
1/15/82	V. Kaubis	Outside Secretarial	2.00
Various	RCA Global Communications	Telexes	9.36
		Total	\$ 45.22

Government of Spain

Various	Xerox Corporation	Duplicating	\$ 18.45
Various	U.S. Postal Service	Postage	.88
		Total	\$ 19.33

INTELSAT

Various	Xerox Corporation	Duplicating	\$ 21.45
Various	C&P Telephone	Telephone	31.65
Various	U.S. Postal Service	Postage	.40
Various	A&P Employees	Cash Expense	1.20
Various	A&P Employees	Local Transportation	22.35
		Total	\$ 77.05

The de Havilland Aircraft of Canada, Ltd.

4/16/82	W. Rogers	Various Local Meals	\$ 484.30
		Total	\$ 484.30

Government of Brazil

Various	Xerox Corporation	Duplicating	\$ 68.70
---------	-------------------	-------------	----------

[Attachment No. 8 is continued on following page.]



ATTACHMENT NO. 8 [continued]

Government of Brazil

Various	U.S. Postal Service	Postage	\$	11.95
Various	C&P Telephone	Telephone		88.56
Various	A&P Employees	Cash Expense		5.00
Various	A&P Employees	Local Transportation		34.05
Various	RCA Global Communications	Telexes		188.73
		Total	\$	396.99

London International Financial Futures Exchange Limited

Various	Xerox Corporation	Duplicating	\$	68.60
Various	C&P Telephone Company	Telephone		30.01
Various	U.S. Postal Service	Postage		40.00
Various	A&P Employees	Local Transportation		53.06
Various	RCA Global Communications	Telexes		160.25
Various	A&P Employees	Cash Expenses		25.00
		Total	\$	376.92

London Commodity Exchange Company Limited,  
Metal Market and Exchange Company, Ltd.,  
London International Financial Futures Exchange Limited,  
London Gold Futures Market, Ltd.

Various	Xerox Corporation	Duplicating	\$	890.70
Various	C&P Telephone Company	Telephone		131.55
Various	U.S. Postal Service	Postage		385.24
Various	RCA Global Communications	Telexes		1,728.17
Various	A&P Employees	Local Transportation		339.95
Various	A&P Employees	Cash Expenses		248.38
Various	S. Hoglund	Proofreading		6.75
Various	A&P Employees	Travel Expenses		413.26
		Total	\$	4,144.00

London Commodity Exchange Company Limited,  
London International Financial Futures Exchange Limited

Various	C&P Telephone Company	Telephone	\$	19.00
Various	A&P Employees	Local Transportation		3.90
Various	A&P Employees	Cash Expenses		31.00
		Total	\$	53.90

London Commodity Exchange Company Limited,  
International Commodities Clearing House, Ltd.

Various	Xerox Corporation	Duplicating	\$	64.80
Various	C&P Telephone Company	Telephone		23.38
Various	U.S. Postal Service	Postage		68.61
Various	RCA Global Communications	Telexes		306.63
Various	A&P Employees	Local Transportation		63.24
Various	A&P Employees	Cash Expenses		309.89

[Attachment No. 8 is continued on following page.]

ATTACHMENT NO. 8 [continued]

London Commodity Exchange Company Limited,  
International Commodities Clearing House, Ltd. [cont'd.]

Various	FOI Services, Inc.	Professional Services	\$ 9.50
		Total	\$ 846.05

ATTACHMENT NO. 9

15. (c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this six-month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes \_\_\_\_\_ No X <sup>\*/</sup>

<sup>\*/</sup> However, the following persons who have filed Short-Form Registration Statements have made political contributions:

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>William J. Baer</u>			
5/12/82	\$ 35	Committee to Elect Barney Frank	Barney Frank
<u>Paul S. Berger</u>			
12/14/81	\$100	Citizens for Sarbanes	Paul Sarbanes
12/21/81	250	Tom Lantos for Congress	Tom Lantos
1/19/82	50	Reelect Steve Sacks	Steve Sacks
1/27/82	100	Friends of Charlie Gilchrist	Charles Gilchrist
3/15/82	250	Committee to Reelect Mike Barnes	Mike Barnes
3/15/82	100	Ben Rosenthal Campaign Committee	Benjamin Rosenthal
4/9/82	500	Committee to Reelect Sen. Moynihan	Daniel P. Moynihan
4/20/82	250	Citizens to Reelect Marion Barry	Marion Barry
5/18/82	200	David Levenson for U.S. Senate	David Levenson
6/3/82	100	Tom Lantos for Congress Committee	Tom Lantos
<u>Myron P. Curzan</u>			
4/30/82	\$100	Citizens for Sarbanes	Paul Sarbanes
5/7/82	\$ 10	Clean Water Action Project	---
6/2/82	\$100	Citizens to Reelect Marion Barry	Marion Barry
6/2/82	\$ 50	Abbe Lowell for Delegate	Abbe Lowell
6/2/82	\$ 50	Committee to Elect Barney Frank	Barney Frank
6/2/82	\$100	Friends of Tom Bradley	Tom Bradley
<u>Vicki J. Divoll</u>			
12/81	\$ 75	O'Leary for Congress	John O'Leary

[Attachment No. 9 is continued on following page.]

ATTACHMENT NO. 9 [continued]

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>James F. Fitzpatrick</u>			
2/9/82	\$250	Railsback for Congress Committee	Tom Railsback
5/24/82	\$500	DeConcini for Congress	Dennis DeConcini
<u>Thomas Fuller</u>			
1/15/82	\$100	Connie Morella	Connie Morella
<u>Melvin C. Garbow</u>			
5/24/82	\$500	Friends of Dennis DeConcini	Sen. Dennis DeConcini
<u>Julius M. Greisman</u>			
12/22/81	\$ 10	Maryland Pre-Election Campaign Fund	Various
<u>Marc D. Guren</u>			
12/20/81	\$ 75	Metzenbaum for Senate	Howard Metzenbaum
<u>Joseph H. Guttentag</u>			
3/82	\$100	Kane for Mayor	Betty Ann Kane
<u>Robert E. Herzstein</u>			
12/5/81	\$250	Friends of Max Baucus	Max Baucus
12/7/81	\$500	Stevenson for Illinois Committee	Stevenson
5/12/82	\$100	Sam Gejdenson	Sam Gejdenson
<u>Robert B. Hummel</u>			
5/3/82	\$ 25	Rose Thorman for Congress	Rose Thorman
<u>Bob Litan</u>			
5/82	\$200	Friends of Sam	Congressman Sam Gejdenson

[Attachment No. 9 is continued on following page.]

ATTACHMENT NO. 9 [continued]

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>Thomas J. McGrew</u>			
4/82	\$1000	Campaign for Mayor of D.C.	Pat Harris
4/82	\$ 200	Committee for the Reelection of Congressman Tom Foley	Tom Foley
<u>Patrick Macrory</u>			
3/15/82	\$ 50	Mike Barnes for Congress	Michael Barnes
2/14/82	\$ 25	Andy Maguire for Senate	Andrew Maguire
<u>Thomas Milch</u>			
12/81	\$ 75	O'Leary for Congress	John O'Leary
<u>Nancy K. Mintz</u>			
3/9/82	\$ 5	Lange for Alexandria City Council Committee	Gene Lange
<u>G. Philip Nowak</u>			
5/82	\$ 30	Betty Ann Kane for Mayor	Betty Ann Kane
<u>Lawrence A. Schneider</u>			
12/31/81	\$ 25	Maryland Democratic Party	Various
12/31/81	\$ 10	Committee to Elect Lois Pines	Lois Pines
12/31/81	\$ 25	Mike Barnes for Congress Committee	Mike Barnes
12/31/81	\$ 20	Steve Sacks for Attorney General	Steve Sacks
3/6/82	\$ 15	Citizens for Goldwater	Marilyn Goldwater
3/23/82	\$ 25	Committee to Elect Lois Pines	Lois Pines
4/11/82	\$ 50	Samuel Mesnick for Judge	Samuel Mesnick
4/12/82	\$100	Mike Barnes for Congress Committee	Mike Barnes
5/15/82	\$ 30	Diane Kirchenbauer	Diane Kirchenbauer
<u>Cary H. Sherman</u>			
5/17/82	\$ 35	Barney Frank for Congress Committee	Barney Frank

[Attachment No. 9 is continued on following page.]

ATTACHMENT NO. 9 [continued]

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>Clifford D. Stromberg</u>			
12/18/81	\$ 50	Mike Barnes for Congress	Mike Barnes
<u>Norton F. Tennille, Jr.</u>			
5/23/82	\$ 25	Gail Klapper	Gail Klapper
<u>Thomas B. Wilner</u>			
12/31/81	\$100	John Ray for Mayor Committee	John Ray

RECEIVED  
U.S. DEPARTMENT  
OF JUSTICE  
CRIMINAL DIVISION  
JUL 19 4 18 PM '82  
INVESTIGATIVE  
SECTION  
REGISTRATION UNIT

UNITED STATES DEPARTMENT OF JUSTICE  
REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D. C. 20530

RECEIVED  
U.S. DEPARTMENT OF JUSTICE  
CRIMINAL DIVISION  
JUL 19 4 17 PM '82  
INFORMATION  
REGISTRATION UNIT

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes XX or No                     

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes                      or No                     

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Brooksley Landau  
Signature

July 16, 1982  
Date

BROOKSLEY LANDAU

Please type or print name of  
signatory on the line above

Partner

                      
Title